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November 20, 2022

Hon. Vernon S. Broderick, USDJ
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 11/21/2022

Re: Soto v. Triumph Construction Corp. et al.
Docket No.: 21-cv-02449-VSB

Dear Judge Broderick,

I represent Plaintiff in the above-entitled action. I write jointly with Defendants' counsel consent to request that, for the reasons that follow, Your Honor kindly extend the time for the parties to submit their settlement agreement for a *Cheeks* review from November 21, 2022 to December 9, 2022. This is the third request of its kind and two previous requests were granted for good cause. There is no prejudice to any party.

Counsel for the parties are in the final stages of working out the text of the settlement agreement with only several secondary issues remaining. It has taken us longer than anticipated because of my trip overseas for the All Souls' Day visit to my mother's grave and the limited access to the internet whilst I was abroad. Unfortunately, now Defendants and their counsel are embarking on trips related to Thanksgiving and will be unable to fully devote their attention to the document in the meantime. We are requesting only as much time as is necessary to ensure that all parties can sign the final document. We also assure Your Honor that we are very much confident that this will be the final request.

Wherefore, I respectfully request that Your Honor extend the time for the parties to file the *Cheeks* motion by December 9, 2022

Respectfully submitted,

/s/ Robert Wisniewski
Robert Wisniewski

cc: via ECF
Brian Gardner, Esq.
Jed Weiss, Esq.
Elizabeth Carbone, Esq.